

REMARKS

Claim Status

Claims 1, 2, 4, 6-14, 16 and 18-24 are now currently pending, with claims 1 and 13 being in independent form. Dependent claims 25-27 have been canceled. Claims 1, 2, 4, 6-14, 16 and 18-24 have been amended. Independent claim 1 has been amended to incorporate the subject matter of canceled claim 25. Independent claim 13 has been amended to incorporate the subject matter of canceled claim 26. No new matter has been added. Reconsideration of the application, as herein amended, is respectfully requested.

Overview of the Office Action

Claims 1, 2, 13 and 14 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Publication No. 2003/0156074 (“*Ranganathan*”). Claims 6, 7, 18 and 19 stand rejected under 35 U.S.C. §103(a) as obvious over *Ranganathan*. Lastly, claims 4, 8-12, 16 and 20-27 stand rejected under 35 U.S.C. §103(a) as obvious over *Ranganathan* in view of U.S. Patent No. 6,241,358 (“*Higuchi*”) and U.S. Patent No. 6,036,328 (“*Ohtsuki*”).

Applicants have carefully considered the Examiner’s rejections and the comments provided in support thereof. For the following reasons, Applicants assert that all claims now presented for examination in the present application are patentable over the cited art.

Patentability of Independent Claims 1 and 13 under 35 U.S.C. §102(b)

Independent claim 1 has been amended to incorporate the subject matter of dependent claim 25 (now canceled). Independent claim 13 has been amended to incorporate the subject matter of dependent claim 26 (now canceled). Thus, amended independent claims 1 and 13 are directed to a method for producing a backlight apparatus for a display and a backlighting

apparatus that comprises a luminous area that corresponds in size to the size of the display. No new matter has been added.

Ranganathan (paragraph [0014]) discloses “an energy-aware approach to display control that involves hardware, including a plurality of displays with varied power properties, and software that exploits this hardware”. According to *Ranganathan*, “[t]he idea is to use energy-aware software control in matching the energy needs associated with one or more applications and their respective visual presentations to particular displays from among the plurality of displays”. *Ranganathan* thus teaches a method for display control including a plurality of displays having varying display properties. In the display methodology disclosed in *Ranganathan*, energy-aware software divides the entire display screen into sub-screens and matches the energy requirement that is associated with each sub-screen to a particular display (see paragraph [0015]). *Ranganathan* thus teaches that multiple displays may be configured with one panel such as a tiled display panel, where each tiled display panel is assigned to a particular sub-screen based on energy consumption (see paragraph [0057]). *Ranganathan* clearly teaches that a single sub-screen is back lit by a single display panel.

In accordance with the method and system of independent claims 1 and 13, however, a single display comprising a scaleable backlighting apparatus having a polygonal luminous area which corresponds to the size of the display is assembled from a plurality of individual polygonal luminous modules. In this manner, the assembled luminous modules simultaneously and in unison back light a single display. *Ranganathan* fails to teach or suggest the claimed invention recited in amended claims 1 and 13.

As described at paragraph [0003] and [0022] of the instant published application, the assemblage of individual modules for a backlighting apparatus provides the advantageous technical effect in that a display can be homogenously illuminated. The illumination of a

displayed by assembled luminous modules would not be obvious to the skilled person based on the teachings of *Ranganathan*. Therefore, *Ranganathan* fails to teach or suggest now amended independent claims 1 and 13 which encompass the foregoing advantageous features.

In view of the foregoing, reconsideration and withdrawal of the rejection of claims 1 and 13 as anticipated by *Ranganathan* under 35 U.S.C. §102 are requested, and a notice to that effect is earnestly solicited.

Moreover, by virtue of the above-discussed differences between the recitations of claims 1 and 13 and the teachings of *Ranganathan*, and the lack of any clear motivation for modifying *Ranganathan* to achieve Applicants' claimed invention, independent claims 1 and 13 are also patentable over *Ranganathan* under 35 U.S.C. §103.

Patentability of Dependent Claims 6, 7, 18 and 19 over the Prior Art under 35 U.S.C. §103

The Examiner (at pg. 4 of the Office Action) acknowledged that *Ranganathan* fails to teach or suggest “the diagonal length of the first and second modules being an integer multiple of 1 inch or the ratio of length to width of the modules being 4:3” as recited in dependent claims 6 and 18 and “the first module having a diagonal of 5 inches and the second module having a diagonal of 7 inches” as recited in dependent claims 7 and 19 but states that discovering the optimum ranges for sizes involves only routine skill in the art. Applicants disagree. There is nothing in *Ranganathan* to cure the above-noted deficiencies concerning the lack of teachings of assembling different-sized luminous modules. *Ranganathan* therefore fails to teach or suggest the features recited in independent claims 1 and 13, let alone in dependent claims 6, 7, 18 and 19. Dependent claims 6, 7, 18 and 19 are accordingly patentable over *Ranganathan*. Reconsideration and withdrawal of the rejection of claims 4 under 35 U.S.C. §103 are requested.

Dependent Claims

The Examiner (at pg. 5 of the Office Action) acknowledged that *Ranganathan* fails to teach or suggest “modules having a light input area with light emitting diodes,” as recited in dependent claims 4, 8, 16 and 20, and cites *Higuchi* and *Ohtsuki* for this feature. The Examiner (at pg. 6 of the Office Action) also acknowledged that *Ranganathan* fails to teach or suggest “an input area, output area or reflective coating” as recited in dependent claims 9 and 21, and cites *Higuchi* for this feature. Applicants disagree that the combination of *Ranganathan*, *Higuchi* and *Ohtsuki* teaches the claimed invention.

Higuchi discloses light guiding blocks having a decreasing thickness, where one guide block overlaps with another guide block (see col. 4, lines 41-60; FIG. 2). However, *Higuchi* fails to explicitly teach or suggest the selection of modules of a basic set having four different-sized modules for assembling a luminous area in a modular manner for a backlighting apparatus of a display. Moreover, *Higuchi* fails to teach or suggest the use of four modules or the use of at least two pairs of different-sized modules for a backlighting apparatus of a display. *Higuchi* thus fails to teach or suggest assembling different-sized luminous modules as defined by amended independent claims 1 and 13.

Ohtsuki discloses one or more LED lamps that emit light into one light-directing plate via a light-incident surface (see Abstract; FIG. 6). However, *Ohtsuki* fails to teach or suggest anything whatsoever with respect to a backlighting apparatus having a plurality of polygonal luminous modules. Consequently, there is nothing in *Higuchi* and *Ohtsuki* to cure the above-noted deficiencies concerning the lack of teachings of assembling different-sized luminous modules. The combination of *Ranganathan*, *Higuchi* and *Ohtsuki* therefore fails to teach or suggest the features recited in independent claims 1 and 13, let alone in dependent claims 4, 8, 9, 16, 20 and 21. Dependent claims 4, 8, 9, 16, 20 and 21 are, accordingly, patentable over

Ranganathan, Higuchi and Ohtsuki. Reconsideration and withdrawal of the rejection of claims 4, 8, 9, 16, 20 and 21 under 35 U.S.C. §103 are requested.

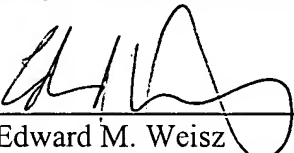
In view of the patentability of independent claims 1 and 13, for the reasons presented above, each of dependent claims 2, 4, 6-12, 14, 16 and 18-24 is patentable therewith. Moreover, each of these claims includes features which serve to even more clearly distinguish the invention over the applied references.

Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

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